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REMARKS

The applicant has amended claims 1, 13 and 25 in order to improve the grammar of the claim. No new matter has been added and the scope of the claim has not been changed. The applicant submits the claims as amended are allowable, which allowance is respectfully requested.

The applicant has added new claim 37. Support for this claim is found for example on page 9, line 13-20 of the present specification. The applicant submits that claim 37 is allowable, which allowance is respectfully requested.

In paragraph 3, the examiner has rejected claims 11 and 12 under 35 U.S.C. 112, second paragraph for reciting the limitation "the same web page" and "another web page without sufficient antecedent basis. The applicant has amended claims 11 and 12 to provide the proper antecedent basis. The applicant has further amended claims 23, 24, 35, 36 for similar reasons as claims 11 and 12. Amended claims 11, 12, 23, 24, 35 and 36 are allowable as they depend on allowable claim 1, 13 and 25 respectively, which allowance is respectfully requested.

In paragraph 5, the examiner rejects claims 1-4, 6-16, 18-28 and 30-36 under 35 U.S.C. 103(a) as being unpatentable over Kozma (U.S. 5,983,169) in view of Chanod (U.S. 6,269,189).

Kozma is directed to translating text from one natural language to another and resolving ambiguities of expressions in order to provide a better translation. Kozma contemplates the use of context in determining a translation such that a phrase is analyzed using the context of the words of the phrase. When ambiguities exist in the phrase, Kozma contemplates resolving the ambiguities by providing separate information that describes the natural language relationships of words and phrases.

The present invention is directed to contextually translating text from one language to another wherein the text to be

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translated is contextually linked to related text wherein the translation process first attempts translation of phrases of the text and when unsuccessful, adds the linked text to the context for translation. In one embodiment, a Web HTML page context is translated with the added context of obtained via a hyperlink.

In paragraph 6 the examiner says that "as per claims 1, 13, and 25, Kozma teaches:" "Translating the first phrase to a second phrase using the additional context [external knowledge] (col. 4, line 1) obtained from a second text if the first translation is not found to exist (in the case of 'the mother of the boy and the orphan', col. 3, line 64, the system used additional information to define the 'orphan' and therefore provide the right translation)." The applicant disagrees. The "external knowledge" of Kozma is not contextual. The external knowledge example of Kozma is a phrase matching mechanism that understands that according to Kozma the expression is parsed "based on knowledge that an orphan is a person whose mother is not living". In Fact Kozma views external knowledge as being different than contextual knowledge as indicated by: "Both contextual and external knowledge based disambiguation require some means..." (col. 4, lines 1-2). Therefore, Kozma does not foresee the element of "using the additional context obtained from a second text if the first translation is not found to exist" as shown in the claim.

According to WORDNET (an online dictionary provided by Princeton University at "<http://wordnet.princeton.edu/>") Context is defined as "discourse that surrounds a language unit and helps to determine its interpretation". Kozma's "external knowledge" can not be construed as contextual in that it is independent of the discourse of the first text and the contextually linked second text of the present invention. Furthermore, Kozma's disambiguation invention could be used in the present invention to provide disambiguation of the first text of the present invention but is silent on expanding the context of the first

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text with a linked second text as shown in the claim. Therefore, the applicant submits that claim 1 is allowable, which allowance is respectfully requested.

The examiner admits that "Kozma does not teach obtaining additional context using a link related to the first text if the unique phrase is not found." The examiner says "Chanod, however teaches an annotation system (col. 17, lines 56-57), suggesting the use of links, for providing extra translation information to the user (hyperlinks, providing the user with translations, col 17, lines 56-66). The applicant disagrees. As the examiner states, Chanod suggest use of links, for providing extra translation information. However, the extra information is not "additional context" as shown in the claim. Furthermore the link of Chanod is not "related to the first text" but is a link to additional translation information unrelated to the first text. The same additional information would be available to any text that Chanod would be translating.

In fact, the extra translation information of Chanod is more related to aspects of the "word meaning analyzer" of claim 9 of the present invention. Our word meaning analyzer of claim 9 is a useful translator option when translating contextually linked text. Therefore, claim 1 is allowable, which allowance is respectfully requested.

Furthermore, the examiner has failed to provide evidence of motivation in Kozma or Chanod to combine Kozma and Chanod. According to *Karsten Mfg Corp. v. Cleveland Gulf Co.*, 242 F.3d 1376, 1385, 58 U.S.P.Q.2d 1286, 1293 (Fed. Cir. 2001), "In holding an invention obvious in view of a combination of references, there must be some suggestion, motivation, or teaching in the prior art that would have led a person of ordinary skill in the art to select the references and combine them in the way that would produce the claimed invention:."

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Also in *re C.R. Bard, Inc. v. M3 Sys., Inc.*, 157 F.3d 1340, 1352, 48 U.S.P.Q.2d 1225, 1232 (Fed. Cir. 1998).

The applicant respectfully requests the examiner provide such evidence.

Notwithstanding, the combination of Kozma with Chanod would teach away from the present invention by providing an embodiment that would contextually translate text from one language to another and annotating the text wherein the translation process would link to "external knowledge" for translation algorithms. The cited art alone or in combination does not foresee contextually translating text wherein the text comprises contextually linked portions as shown in the claim. Therefore, claim 1 is allowable, which allowance is respectfully requested.

In paragraph 8 the examiner says as per claim 3, 15, and 27, Chanod teaches hyperlinks, therefore it would have been obvious to use hyperlinks in HTML code to provide access to help information from on-line multi-documents. The applicant disagrees. The hyperlinks of Chanod are used to provide additional translation help to the translator. They are not contextual links to additional contextual text as shown in the claims, therefore, the claim is allowable, which allowance is respectfully requested.

In paragraph 16, the examiner says as per claims 11, 12, 23, 24, 35 and 36 "Kozma does not teach links to context within the same or different page. Chanod teaches links to online documents. Therefore, it would have been obvious to have added Chanod's feature of using hyperlinks to the translation system of Kozma, in order to select the best translation for an input phrase. Neither Kozma nor Chanod specify if the link to context is within the same web page or in a different web page. The examiner takes official notice that it's well known to have information links within the same webpage or in a different webpage. Therefore, it would have been obvious to have information links within and in a

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different webpage to get enough information about a word or a subject." The applicant disagrees.

According to *In re Zurko*, 258 F.3d 1379, 59 U.S.P.Q.2d 1693 (Fed. Cir 2001) "the Board cannot simply reach conclusions based on its own understanding or experience -- or on its assessment of what would be basic knowledge or common sense. Rather, the Board must point to some concrete evidence in the record in support of these findings". The applicant respectfully requests the examiner provide evidence to his assertion (Also MPEP 2144.03C).

The use of links to find additional context is an important point of novelty of the present invention. The examiner has not shown prior art that performed language translation on contextually linked text as shown in the claim.

The applicant submits that claims 13 and 25 are allowable as they have substantially the same limitations as allowable amended claim 1, which allowance is respectfully requested.

The applicant submits that claims 2-12, 14-24 and 26-36 are allowable as they depend on allowable claims 1, 13 and 25 respectively, which allowance is respectfully requested.

It is respectfully submitted that the application is now in condition for allowance, which allowance is respectfully requested.

RESPECTFULLY SUBMITTED

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